



# MIRANDA SOKOLOFF SAMBURSKY SLONE VERVENIOTIS LLP

MICHAEL A. MIRANDA\*  
BRIAN S. SOKOLOFF  
STEVEN VERVENIOTIS  
ONDINE SLONE  
NEIL L. SAMBURSKY\*  
RICHARD S. SKLARIN°  
STEVEN C. STERN  
ADAM I. KLEINBERG

THE ESPOSITO BUILDING  
240 MINEOLA BOULEVARD  
MINEOLA, NY 11501  
TEL (516) 741-7676  
FAX (516) 741-9060  
WWW.MSSSV.COM

**BRANCH OFFICES:**  
WESTCHESTER, NY  
NEW YORK, NY  
FANWOOD, NJ

JENNIFER E. SHERVEN  
GABRIELLA CAMPIGLIA  
TODD HELLMAN  
CHARLES A. MARTIN  
KIERA J. MEEHAN  
MARIA THOMAS  
NANCY R. SCHEMBRI°  
MICHAEL V. LONGO  
MELISSA HOLTZER  
MICHAEL P. SIRAYO  
ARIEL S. ZITRIN  
PATRICK J. MALONEY  
JONATHAN B. ISAACSON\*  
ANNE ZANGOS  
KELLY C. HOBBS\*

TIMOTHY J. MURPHY  
MARK R. OSHEROW\*°  
COUNSEL

\* ALSO ADMITTED IN NEW JERSEY  
° ALSO ADMITTED IN CONNECTICUT  
° ALSO ADMITTED IN FLORIDA  
\* ADMITTED IN WESTCHESTER

July 21, 2008

Hon. Stephen C. Robinson  
United States District Court  
Southern District of New York  
300 Quarropas Street  
White Plains, NY 10601-4150

**MEMO ENDORSED**

**Re: Nagle v. Marron, et al.**  
Docket No.: 07-CV-2860 (SCR)  
Our File No.: 07-326

Dear Judge Robinson:

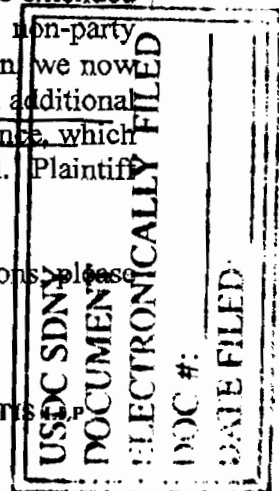
We represent defendants Mamaroneck Union Free School District, Paul R. Fried, Rosemarie Coletti and Steven Castar with regard to the above-referenced matter.

We respectfully request that the deadline for the completion of discovery to be extended so that the parties may finish conducting depositions. Recently, we conducted a non-party deposition in Utah. Due to several new issues that were raised during this deposition, we now need to conduct two more non-party depositions. As such, we respectfully request an additional thirty (30) days to complete discovery. We respectfully request that the status conference, which is currently scheduled for July 25, 2008, to be adjourned for thirty (30) days as well. Plaintiff consents to this request.

Thank you for your time and attention to this matter. If you have any questions, please do not hesitate to contact me.

Respectfully submitted,  
MIRANDA SOKOLOFF SAMBURSKY SLONE VERVENIOTIS  
  
Melissa Holtzer

cc: Jane Gould, Esq.



Discovery is to be completed by 9/11/08.  
Conference is adjourned to 9/12/08  
@ 10 AM.

**APPLICATION GRANTED**  
  
HON. STEPHEN C. ROBINSON 7/21/08